

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

GESTURE TECHNOLOGY PARTNERS,
LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

Civil Action No. 6:21-cv-00121-ADA

JURY TRIAL DEMANDED

**JOINT NOTICE OF VENUE AND JURISDICTIONAL DISCOVERY REGARDING
APPLE INC.'S OPPOSED MOTION TO TRANSFER VENUE**

Plaintiff Gesture Technology Partners, LLC (“GTP” or “Plaintiff”) and Defendant Apple Inc. (“Apple” or “Defendant”) file this Joint Notice of Venue and Jurisdictional Discovery Regarding Apple Inc.’s Opposed Motion to Transfer Venue Pursuant To 28 U.S.C. § 1404(a) (Dkt. No. 21) (the “Motion to Transfer”), as follows:

Defendant filed the Motion to Transfer on July 30, 2021. Under the governing rules, GTP’s response would be due on August 13, 2021. However, GTP has notified Defendant that, in order to adequately respond to the Motion to Transfer, it intends to conduct venue and jurisdictional discovery in accordance with the Court’s Amended Standing Order Regarding Venue and Jurisdictional Discovery Limits for Patent Cases dated June 8, 2021 (the “Standing Order”). Venue and jurisdictional discovery will end on November 1, 2021, and Plaintiff’s Response to Defendants’ Motion will be due on November 15, 2021. Defendant’s Reply will be due on December 6, 2021. The parties will attempt to agree concerning the scope for venue and jurisdictional discovery. If they are unable to do so, they will seek a telephonic conference with the Court pursuant to the Standing Order.

Dated: August 13, 2021

Respectfully submitted,

By: /s/ Fred I. Williams

Fred I. Williams

Texas State Bar No. 00794855

Michael Simons

Texas State Bar No. 24008042

WILLIAMS SIMONS & LANDIS PLLC

327 Congress Ave., Suite 490

Austin, TX 78701

Tel: 512-543-1354

fwilliams@wsltrial.com

msimons@wsltrial.com

Todd E. Landis

State Bar No. 24030226

WILLIAMS SIMONS & LANDIS PLLC

2633 McKinney Ave., Suite 130 #366

Dallas, TX 75204

Tel: 512-543-1357

tlandis@wsltrial.com

John Wittenzellner

Pennsylvania State Bar No. 308996

WILLIAMS SIMONS & LANDIS PLLC

1735 Market Street, Suite A #453

Philadelphia, PA 19103

Tel: 512-543-1373

johnw@wsltrial.com

Attorneys for Plaintiff

Gesture Technology Partners, LLC

/s/ John M. Guaragna

John M. Guaragna

Texas Bar No 24043308

DLA PIPER LLP (US)

303 Colorado Street, Suite 3000

Austin, TX 78701

Phone: (512) 457-7000

john.guaragna@us.dlapiper.com

Sean Cunningham (*pro hac vice*)

Catherine Huang (*pro hac vice*)
DLA PIPER LLP (US)
401 B Street, Suite 1700
San Diego, CA 92101-4297
Tel: 619.699.2700
Fax: 619.699.2701
sean.cunningham@us.dlapiper.com
catherine.huang@us.dlapiper.com

Michael D. Jay (*pro hac vice*)
DLA PIPER LLP (US)
2000 Avenue of the Stars
Suite 400 North Tower
Los Angeles, CA 90067
Tel: 310.595.3000
Fax: 310.595.3300
michael.jay@us.dlapiper.com

Christopher Deck (*pro hac vice*)
DLA PIPER LLP (US)
33 Arch Street, 26th Floor
Boston, MA 02110-1447
Tel: 617.406.6000
Fax: 617.406.6100

*Attorneys for Defendant
Apple Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 13, 2021, the undersigned caused a copy of the foregoing document to be served on all counsel of record via the Court's CM/ECF system, pursuant to the Federal Rules of Civil Procedure.

/s/ Fred I. Williams
Fred I. Williams

CERTIFICATE OF CONERENCE

The undersigned hereby certifies that counsel for Gesture Technology Partners, LLC and counsel for Apple Inc. met and conferred, and all parties agree to filing the foregoing document as a joint notice.

/s/ Fred I. Williams
Fred I. Williams